

# **EXHIBIT I**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

PARNELL COLVIN, )  
Plaintiff, )  
vs. ) CASE NO.:  
M.J. DEAN CONSTRUCTION, ) 2:20-cv-01765-APG-EJY  
INC., )  
Defendant. )

VIDEO CONFERENCE DEPOSITION OF PAUL ROSEQUIST  
LAS VEGAS, NEVADA  
FRIDAY, AUGUST 6, 2021

**CERTIFIED  
TRANSCRIPT**

REPORTED BY: JACKIE JENNELLE, RPR, CCR #809  
JOB #416567

1           **Q. Tell me about your investigation.**

2            MR. ROSENTHAL: Objection, overbroad, vague  
3 and ambiguous.

4            BY MR. MARKS:

5           **Q. Tell me what you did to investigate the  
6 allegations contained in Exhibit 6.**

7           A. I -- when it first started, as I've stated  
8 prior, is I had Parnell Colvin fill out his report.  
9 I submitted that report.

10           I asked him if there was any other  
11 witnesses or anyone else he would like for me to  
12 interview, and he told me he wanted me to interview  
13 Ricky Flores, which is one of the foremen on the MSG  
14 Sphere project.

15           I then contacted Kevin Gutierrez to take  
16 his testimony, his incident investigation, his  
17 statement. I called him on the phone, asked him to  
18 come to my office.

19           When he got to my office, I gave him some  
20 general information on what was happening at the  
21 time and I had him fill out a statement like I did  
22 with Mr. Colvin.

23           **Q. Okay. Did Mr. Gutierrez deny using the  
24 N-word?**

25           A. Yes.

1           **Q. And --**

2           A. Adamantly denied that.

3           **Q. Did Mr. Flores hear anything about the**  
4           **N-word on the job?**

5           A. Not that he has ever told me about.

6           **Q. Okay. So after that, did anything else**  
7           **ever happen regarding your investigation?**

8           A. Yes.

9           **Q. What did you do?**

10          A. I then called Ricky Flores, had him come to  
11 my office, gave him the same basic rundown, had him  
12 fill out the forms in the same manner as previously  
13 and then I submitted his.

14          I then called in Dave McGrandy (phonetic)  
15 who was the area superintendent for Area D which  
16 Colvin was a part of. And I had him also fill out a  
17 witness statement.

18          Then when I got all the witness statements  
19 and after I had reviewed them, I called John  
20 Thomason and went over these with John Thomason and  
21 seeked his counsel from that point forward.

22          **Q. What did John Thomason say?**

23          A. I wouldn't want to misquote Mr. Thomason.  
24 He spoke about the possibilities of moving somebody  
25 around to make this work for everybody.

## 1 CERTIFICATE OF REPORTER

2 STATE OF NEVADA )  
3 ) SS:  
4 COUNTY OF CLARK )5 I, Jackie Jennelle, RPR, CCR #809, Clark  
6 County, State of Nevada, do hereby certify: That I  
7 reported the video conference deposition of PAUL  
8 ROSEQUIST, commencing on FRIDAY, AUGUST 6, 2021, at  
9 10:00 a.m.10 That prior to being deposed, the witness  
11 was duly sworn by me to testify to the truth. That  
12 I thereafter transcribed my said shorthand notes  
13 into typewriting and that the typewritten transcript  
14 is a complete, true and accurate transcription of my  
15 said shorthand notes.16 I further certify that I am not a relative  
17 or employee of counsel, of any of the parties, nor a  
18 relative or employee of the parties involved in said  
19 action, nor a person financially interested in the  
20 action.21 IN WITNESS WHEREOF, I have set my hand in my  
22 office in the County of Clark, State of Nevada, this  
23 19th day of August, 2021.24  
25 JACKIE JENNELLE, RPR, CCR #809